

Wiltshire Council Planning Consultation Response

URBAN DESIGN

Officer name:

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Application No: PL/2026/03375

Proposal: Outline application for the demolition of number 5 and 6 Storridge Road and the erection of up to 165 dwellings (including affordable housing), with public open space, structural planting, landscaping, and sustainable drainage system (SuDS) and vehicular access point. All matters reserved except for means of access.

Site Address: Land off Storridge Road, Westbury, BA13 4HX

Case Officer: Gen Collins

Reference:

Drawings and documents indexed 27th May and 9th June 2026 on the application webpage.

Policy and guidance:

- Wiltshire Core Strategy (abbreviated WCS), Core Policy 57 'Ensuring high quality design and place shaping' (abbreviated CP57)
- Wiltshire Local Plan Review - Pre-Submission Draft 2020-2038 (Regulation 19) (September 2023) (abbreviated WLPR)
- Wiltshire Design Guide – Wiltshire Council Supplementary Planning Document adopted 25th March 2024 (abbreviated WDG)
- National Planning Policy Framework (MHCLG December 2024) (abbreviated NPPF)
- National Design Guide (MHCLG January 2021) (abbreviated NDG)
- Building for a Healthy Life (Homes England updated May 2026) (referenced in the NPPF) (abbreviated BfHL)
- Streets for a Healthy Life: A companion guide to Building for a Healthy Life (Homes England) (abbreviated SFHL)
- Westbury Neighbourhood Plan 2023-2036 (Made March 2024) (abbreviated WNP)
- Westbury Neighbourhood Plan Character Statement & Design Guide January 2024 Annexe 3

Wiltshire Council's Core Strategy Policy CP57 'Ensuring high quality design and place shaping': A high standard of design is required in all new developments, including extensions, alterations, and changes of use of existing buildings. Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality.

The examination of the emerging Wiltshire Local Plan has been paused and the weight to be afforded to any part of the emerging plan can be no more than very limited. A decision on how to proceed will be made by the Council in May 2026.

Observations

The site lies outside, but immediately adjacent to, the Westbury Settlement Boundary (2020) and was not identified as an allocation within the emerging Wiltshire Local Plan (January 2023). Whilst the Planning and Affordable Housing Statement asserts that the site represents a logical extension to the north-western edge of Westbury and a sustainable location for residential development, the proposal currently remains speculative in planning terms.

Notwithstanding the above, should the principle of development be accepted, I have the following initial observations regarding the scale, form and layout of development illustrated on the indicative masterplan. As no detailed house types or architectural proposals have been submitted at this stage, my comments relate principally to the proposed layout and movement framework.

I have also had regard to the site's planning history in formulating these comments.

Whilst the site falls within the Heywood Neighbourhood Plan area, it is located immediately adjacent to the Westbury Neighbourhood Plan area. Consequently, the proposals should have appropriate regard to the Westbury Neighbourhood Plan, particularly Annex 3, given that the development's sustainability credentials and active travel aspirations rely upon connections through Westbury and access to the town centre and its services.

Objection

- 1) The appeal scheme incorporated a spine road loop in the eastern part of the site, as illustrated on Figure 5.7 (Street Hierarchy Plan) within the Design and Access Statement. The current proposals omit this key element of the movement network.

Instead, the streets beyond the Hawkeridge sewerage pumping station would form a series of interconnected cul-de-sacs served by communal driveways. These arrangements accommodate a substantial number of dwellings but terminate in dead ends without providing a connected vehicular route through the eastern part of the site.

This arrangement relies heavily on parking courts and private shared drives and is inconsistent with the Wiltshire Design Guide (paragraph 5.2.1), which advises that cul-de-sacs should be short and have a visible termination point from their junction with a through route. The scale and extent of the proposed dead-end arrangements exceeds this expectation.

Furthermore, the layout would conflict with Core Policy 57, particularly criteria vii and ix, which seek to promote legible, accessible and well-connected places. The predominance of dead-end streets would reduce route choice and permeability, resulting in a less intuitive and less connected movement network.

The proposed arrangement is also characteristic of the patterns identified within BfHL (pages 76–77) as 'red' outcomes, namely layouts dominated by cul-de-sacs that limit direct movement and undermine legibility. Such an approach contrasts with the connected street patterns promoted by the guidance.

The prevalence of dead-end streets would also increase reliance on turning and reversing manoeuvres for servicing and refuse collection. This may necessitate multiple communal collection points, creating inconvenience for residents and potentially detracting from the quality of the street environment.

Recommendation: A loop road should be provided within the eastern part of the site, linking the spine road with a proposed edge lane to create a more connected and legible street network. This would better accord with Core Policy 57, the Wiltshire Design Guide and the preferred 'green' approach identified in BfHL (1Ge).

Drainage

- 2) The Surface Water Drainage Strategy shows a single drainage basin and a reliance on a below street piped solution. According to Wiltshire Design Guide expectations 6.3 and 6.5, attenuation features should avoid appearing as unnatural, engineered depressions, and measures to slow water runoff should be employed, i.e. all runoff should not simply be accelerated to basins through drains and pipes.

A distributed SuDS strategy should be adopted, incorporating a network of smaller-scale features such as wetlands, rain gardens, swales, permeable surfaces, and attenuation basins. These should be integrated at both street and plot level to manage runoff more effectively, improve water quality, and provide multi-functional green infrastructure.

This approach would enhance the visual quality of the development, support biodiversity, and reinforce local character, while ensuring compliance with design guidance.

Recommendation: Revise the drainage strategy to ensure compliance with the DEFRA SuDS National Standards (June 2025) and alignment with WDG expectations for green and blue infrastructure. The strategy should incorporate Building for Healthy Life principles by prioritising naturalistic SuDS features, including rain gardens, swales, and wetlands, to enhance visual quality, biodiversity, and site character.

Street Hierarchy

- 3) The DAS does not include a street hierarchy for the current development proposals. Instead, it relies on the street hierarchy plan prepared for the appeal scheme (see Comment 1). As a result, the proposed development fails to clearly articulate the intended street character, function and user experience. It also misses opportunities to demonstrate how sustainable drainage features (SuDS) and street trees will be integrated within the public realm. SfHL, for example, promotes a broad range of street typologies, including shared surface streets, to support greater variety in spatial character and user experience.

This issue is further compounded by the absence of defined street typologies. No cross-sections, dimensions or illustrative material have been provided to distinguish between street types or clarify their respective functions and design objectives. Consequently, the proposed hierarchy lacks legibility in both spatial and design terms.

Street trees should be incorporated within the public realm on all streets, preferably within verges, to maximise their contribution to character, biodiversity and climate resilience. Likewise, all streets should integrate SuDS features in accordance with best practice (see Comment 2). To ensure their long-term protection, management and maintenance, these elements should be located within communal areas subject to public management arrangements, rather than within private plots as currently proposed along several internal streets. This approach would align with the preferred 'green' examples identified in *Building for a Healthy Life* and *Healthy Streets*, rather than the less successful 'red' examples.

Recommendation: To establish a clear and legible street hierarchy, the applicant should define a series of street typologies supported by design principles. These should be informed by the SfHL framework and illustrated through cross-sections and diagrams that demonstrate differences in scale, function, and character. *Clear variations in character for streets is*

more effective than relying on housing “character areas” (BfHL Section 8 d.).

Lower-order streets should incorporate street trees within the public realm to ensure long-term management and resilience. All streets should also integrate sustainable drainage features, in accordance with best practice (see comment 8).

Parameter Plan

- 4) Although much of the required information is included within the DAS, no Parameter Plans or Indicative Masterplan have been submitted and therefore fails to meet the requirements of the WDG Appendix C - Recommended Design Information which offers guidance as to the information that may be expected to support an application dependent on the location, nature, size and complexity of a development scheme. Given the complexity and size of this development, providing as much information as possible at Outline stage is likely to facilitate a smoother consideration at Reserved Matters.

Recommendation: The following drawing / plans should also be included with the planning application for outline permission.

- **Movement Parameter Plan** - showing convenient, legible (and continuous where appropriate) networks for all modes relating to block structure and development scale. This should include the illustrative street hierarchy.
- **Density Scale and Massing Parameter Plan** - should avoid generic principles of low-density edge and high-density entrance space/primary route. The density should respond to the urban design strategy that is more nuanced and considers the wider context and opportunities, focusing density on public transport routes, community facilities and public realm spaces that benefit from being more vibrant. This should include the key building locations shown in Figure 4.55 for example.
- **Open Space / GI & BI Parameter Plan** – distinguishing the different types of open space, i.e. SuDS, retained landscape, accessible POS, play areas, allotments, formal recreation areas, inaccessible wildlife zones and new woodland planting.
- **Illustrative Masterplan** – as shown in the DAS.

Recommendation: Separate Parameter Plans and an Illustrative Masterplan should be submitted to fully assess the development proposals and guide future reserved matters application.

Noise

- 5) The Noise Assessment does not consider the potential noise impacts arising from the WWTE on the proposed public open spaces. External amenity areas, including private gardens, balconies and public open spaces, are afforded consideration under the Noise Policy Statement for England and the NPPF. These documents recognise that where external amenity spaces form an integral part of a development's design, the acoustic environment of those spaces should be assessed to ensure they provide an acceptable level of amenity and can be enjoyed for their intended purpose.

Recommendation: The Noise Assessment should be updated to assess the likely noise impacts on the proposed public open spaces located closest to the WWTE. This assessment should demonstrate that the acoustic environment of these areas is suitable for their intended recreational and amenity use.

Use and Amount

- 6) At the Appeal, the Council confirmed during cross-examination that it had no concerns regarding the character and appearance of the proposal, provided that development did not exceed a density of 38 dwellings per hectare (dph) and remained within the areas allocated for built

development. Both the extent of built form and the maximum density could be controlled by condition.

In this context, the proposed residential development area extends to 4.26 hectares. Applying the agreed maximum density of 38 dph results in a capacity of approximately 162 dwellings. Accordingly, the development should provide for no more than 162 dwellings within the residential development area.

Recommendation: The description of development should be reduced to up to 162 dwellings.

Character

- 7) The DAS does not currently provide information on character areas across the site. As supported by WDG 5.2.10, character areas are best defined by the experience of users at the street and space level.

To support this approach, an Urban Design Principles Plan should be prepared to clearly define the characteristics of key streets and spaces. This will help ensure the development is legible, coherent, and attractive to users.

The plan should describe the intended identity of each key street and space, including key characteristics such as building form, height, architectural detailing, density, and boundary treatments. These elements will provide a framework to guide future development.

Recommendation: An Urban Design Principles Plan should be submitted for approval. Alongside the Street Hierarchy details noted above, this will form a clear framework for future development and provide a foundation for a possible Design Code (see comment below).

BfHL assessment

The DAS includes a BfHL assessment. This represents an initial step in reviewing the design proposals, and the following section - using the red, amber and green traffic light system - provides preliminary responses for further consideration.

Major development proposals accompanied by a Building for a Healthy Life assessment will allow proposals to be more readily evaluated, and should demonstrate a score of no 'reds', and achieve a majority of 'greens' (WNP page 30)

- ✓ Natural connections – the Illustrative Masterplan shows extensive use of private drives particularly within the eastern area of the development. These create breaks in frontage and limit pedestrian and cycle permeability along the site edges. Along the southern boundary, a continuous edge lane would be preferable, linking to the primary street, providing clearer movement routes and a more coherent urban structure. A connection to the existing play area must be secured.
- ✓ Walking, cycling and public transport - the development incorporates a comprehensive set of active travel corridors and links to public transport and enables connects beyond the site's boundaries.
- ✓ Facilities and services – the site lies close to Westbury train station and several local retail and community facilities in Westbury. Walking and cycling will therefore be a realistic alternative to car trips to employment or local services and facilities.
- ✓ Homes for everyone - the development will deliver 40% affordable housing, in line with current local policy, providing a mix of tenures including social rent, shared ownership, and market sale. This

approach supports housing choice and addresses local needs for both affordable and family-sized homes. Homes should aim to meet the Nationally Described Space Standards.

- ✓ Making the most of what's there - the proposals maximise the site's existing landscape assets by retaining boundary vegetation and enriching it with new tree and shrub planting. This enhances both ecological value and visual character. These elements are incorporated into continuous green corridors that reinforce biodiversity and strengthen links to the wider landscape network.
- ✓ A memorable character - The proposed layout effectively incorporates ecological corridors, a tree-lined primary route and a network of public open spaces, contributing positively to connectivity and legibility across the site. However, the submission would be strengthened by the inclusion of a Design Principles Plan to provide a robust framework for future Reserved Matters applications, ensuring that the vision for creating memorable and distinctive places, as indicated within the DAS, is consistently delivered.

Building designs should reflect the local vernacular by incorporating stone detailing, varied rooflines, projecting windows, chimney stacks, and well-proportioned window arrangements. These elements will help ensure design coherence across the scheme and alignment with the principles set out in the WDG.

- ✓ Well defined streets and spaces – The development proposals lack a clear street hierarchy.
- ✓ Easy to find your way around - the eastern area of the development lacks clarity with a contrived arrangement of rear and front parking areas and dead ends. This should be simplified with a continuous edge lane providing a loop with the primary street.
- ✓ Healthy streets - the primary street incorporates a tree-lined verge along only part of its length. Integrated rain gardens should be provided to support sustainable drainage and enhance biodiversity. All lower-hierarchy streets should also be planted with street trees, located within the public realm to ensure long-term maintenance and resilience, and should incorporate sustainable drainage features.
- ✓ Cycle and car parking - the development incorporates several car parking options, with a contrived arrangement of rear and front parking areas within the eastern area of the site. This arrangement weakens the street legibility and diminishes the urban form. Revisiting the layout to include more traditional streets and spaces, would help create a stronger and more coherent streetscape.
- ✓ Green and blue infrastructure - while the proposal includes an attenuation basin, further consideration should be given to reducing reliance on below-ground pipes. This could be achieved by incorporating additional green and blue infrastructure in line with WDG principles, distributing water storage more effectively across the site. Potential measures include rain gardens, increasing permeable surfacing, and introducing small ponds along lower-hierarchy streets. This approach would enhance biodiversity, improve surface-water management, and strengthen alignment with the WDG's integrated green and blue infrastructure guidance.
- ✓ Back of pavement front of home - in keeping with Wiltshire's vernacular character, front-of-plot boundaries could feature low stone walls along the principle routes and open spaces. This approach reinforces a distinctive sense of place and maintains visual continuity with the surrounding context, as recommended in the WDG. The interface between private rear gardens and adjacent public or shared spaces - including highways, public open space (POS) and parking courts - should generally be defined by robust masonry walls to ensure durability, privacy, and a high-quality public realm.

Informatives

Design Review

The National Planning Policy Framework (NPPF) recognises the importance of design review in securing high quality development. Accordingly, major development proposals are encouraged to undergo independent design review at an early stage of the design process. The NPPF states that significant weight should be given to designs that “help to raise the standard of design more generally in an area”, with the draft revised NPPF proposing to increase this to substantial weight. Where a scheme has been subject to independent review and endorsement and can demonstrate how the proposal will raise design standards within the locality, this may attract significant weight in the planning balance.

Where a scheme has undergone independent design review, the Council will take the panel's recommendations into account as part of its assessment and decision-making process. The Council's Urban Design Team can provide further advice on design review options and the value this can add to the development process.